

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JEREMY CONKLIN, D.O., an individual,

No. 2:18-cv-00090

Plaintiff.

V

UNIVERSITY OF WASHINGTON
MEDICINE, et al.

Defendants

**STIPULATED MOTION AND
ORDER EXTENDING DEADLINE
TO RESPOND TO CONDUCT
26(f) CONFERENCE, SUBMIT
JOINT STATUS REPORT, AND
EXCHANGE INITIAL
DISCLOSURES**

Clerk's Action Required

STIPULATED MOTION

All parties, by and through their respective counsel, hereby stipulate, agree and move for an order extending the deadline for the parties to conduct a planning conference under Federal Rule of Civil Procedure 26(f), submit a joint status report pursuant to Local Rule 16(a), and exchange initial disclosures.

1. Plaintiff filed the original complaint in this case on January 22, 2018. The parties stipulated to a deadline of April 2, 2018 for responses to the complaint.

2. The first defendant appeared on February 6, 2018, which would make a joint status report pursuant Federal Rule of Civil Procedure 16 due on April 2, 2018.

1 3. On March 12, 2018, Plaintiff filed an amended complaint. On March 14, 2018,
2 all parties submitted a stipulation setting the following briefing schedule for motions to dismiss
3 the amended complaint, which the Court approved on March 20, 2018:

- 4 • Opening briefs due: April 26, 2018
5 • Response briefs due: May 17, 2018
6 • Reply briefs due: May 25, 2018.

7 4. In light of Plaintiff's amended pleading and the new schedule for motions to
8 dismiss, the parties stipulate and jointly request to extend the deadline for conducting a Rule
9 26(f) conference to May 4, 2018, the deadline to submit a joint report is extended to May 11,
10 2018, and the deadline to exchange initial disclosures is extended to May 18, 2018.

11
12 STIPULATED to this 29th day of April, 2018.

13
14 HKM EMPLOYMENT ATTORNEYS LLP DAVIS WRIGHT TREMAINE LLP
15

16
17 /s/ Kristi Favard
Kristi Favard , WSBA #34419
600 Stewart Street, Ste 901
Seattle, WA 98101
Telephone: (206) 972-6858
Email: kfavard@hkm.com

20 *Attorneys for Plaintiff*

18 /s/ David A. Maas
19 Douglas C. Ross, WSBA #12811
David Maas, WSBA #50694
James Corning, WSBA #45177
20 1201 Third Avenue, Suite 2200
Seattle, WA 98101-3045
Telephone: (206) 622-3150
Email: douglasross@dwt.com
davidmaas@dwt.com
jamescorning@dwt.com

23
24 *Attorneys for Defendants University of
Washington Medicine,, UW Medicine/NW,
University of Washington Medical Center,
University of Washington School of Medicine,
Paul Ramsey, M.D., Lester Permut, M.D.,
Seattle Children's Hospital, Children's
University Medical Group*

1 BYRNES KELLER CROMWELL LLP

2
3 /s/ Anita Stork
4 Anita Stork
5 Sonia Lahr-Pastor
6 Covington & Burling LLP
7 One Front Street,
8 San Francisco, CA 94111-5356
9 Telephone: 1-415-591-6000
10 Email: astork@cov.com
slahrpastor@cov.com

11 Paul R. Taylor, WSBA #14851
12 Nicholas Ryan-Lang, WSBA #45826
13 1000 Second Avenue, 38th Floor
14 Seattle, WA 98104
15 Telephone: (206) 622-2000
16 Email: ptaylor@byrneskeller.com
nryanlang@byrneskeller.com

17 *Attorneys for Defendant Accreditation
18 Council for Graduate Medical Education*

19 BETTS PATTERSON & MINES

20 /s/ James D. Nelson
21 James D. Nelson, WSBA # 11134
22 Natalie A. Moore, WSBA #45333
23 Shaina R. Johnson, WSBA # 46079
24 701 Pike Street, Suite 1400
25 Seattle, WA 98101
26 Telephone: (206) 343-7053
27 Email: jnelson@bpmlaw.com
nmoore@bpmlaw.com
sjohnson@bpmlaw.com

28 *Attorneys for Defendant Thoracic Surgery
29 Directors Association, Inc.*

FOSTER PEPPER LLP

3 /s/ Michael K. Vaska
4 Michael K. Vaska, WSBA #15438
5 Rylan L.S. Weythman, WSBA #45352
6 Devra R. Cohen, WSBA #49952
7 1111 Third Avenue, Suite 3000
8 Seattle, WA 98101
9 Telephone: (206) 447-4400
10 Email: mike.vaska@foster.com
rylan.weythman@foster.com
devra.cohen@foster.com

11 *Attorneys for Defendant American Board of
12 Thoracic Surgery, Inc.*

ORDER

Based on the foregoing, the deadline for the parties to conduct a Rule 26(f) conference is extended to May 4, 2018, the deadline for the parties to submit a joint status report pursuant to Local Rule 16 is extended to May 11, 2018, and the deadline to exchange initial disclosures is extended to May 18, 2018.

DATED this 4th day of April, 2018.

Mrs Casnik

Robert S. Lasnik
United States District Judge

Presented by:

DAVIS WRIGHT TREMAINE LLP

/s/ David A. Maas

Douglas C. Ross, WSBA #12811
David Maas, WSBA #50694
James Corning, WSBA #45177
1201 Third Avenue, Suite 2200
Seattle, WA 98101-3045
Telephone: (206) 622-3150
Email: douglasross@dwt.com
davidmaas@dwt.com
jamescorning@dwt.com

Attorneys for Defendants University of Washington Medicine,, UW Medicine/NW, University of Washington Medical Center, University of Washington School of Medicine, Paul Ramsey, M.D., Lester Permut, M.D., Seattle Children's Hospital, Children's University Medical Group, Mary Bridge Children's Foundation